

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RAHUL MANCHANDA,

*Plaintiff,*

-against-

GOOGLE, YAHOO, MICROSOFT BING,

*Defendants.*

Civil Action No. 1:16-cv-03350 (JPO)(JCF)

**DEFENDANT YAHOO, INC.'S NOTICE  
OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that upon the Memorandum of Law in Support of Defendant Yahoo, Inc.'s Motion to Dismiss, dated May 12, 2016; Request for Judicial Notice, dated May 12, 2016; and all prior pleadings and proceedings had herein, Defendant Yahoo, Inc. ("Yahoo"), by and through its undersigned attorneys, will move this Court, before the Honorable J. Paul Oetken, United States District Judge, at the United States Courthouse, 40 Foley Street, Courtroom 706, New York, New York, for an order granting Yahoo's Motion to Dismiss Plaintiff's Complaint in its entirety pursuant to Rule 12(b)(6) of the Federal Rules of Procedure; and for such other and further relief as deemed just and proper by this Court.

Dated May 12, 2016

Respectfully submitted,

**KILPATRICK TOWNSEND & STOCKTON LLP**

/s/ Jeremy A. Schachter

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*Attorneys for Defendant Yahoo Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that on this 12th day of May, 2016, I served a copy of the foregoing  
**Motion to Dismiss** upon counsel for Plaintiff by sending it via Federal Express addressed as follows:

Rahul D. Manchanda, Esq.  
MANCHANDA LAW OFFICE PLLC  
30 Wall Street, 8th Floor  
New York, New York 10005

A copy was also served via email to RDM@MANCHANDA-LAW.COM.

*/s/ Jeremy A. Schachter*

Jeremy A. Schachter